

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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September 19, 2023

**Via Electronic Filing**

The Honorable Taryn A. Merkl, U.S.M.J.  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Blanco et al v. Winstar Service Inc. et al*  
Case No.: 1:23-cv-02028-RPK-TAM

Dear Honorable Magistrate Judge Merkl:

This law firm represents Plaintiffs, Irving Blanco, Kevin Gregorio Martinez Garcia and Yorkenit Jose Hernandez Mujica (collectively, the “Plaintiffs”) in the above-referenced matter.

Out of an abundance of caution, the following letter respectfully serves to advise the Court that the parties have agreed to dispose of the instant action through the filing of an offer of judgment, pursuant to Federal Rule of Civil Procedure (“Fed.R.Civ.P.”) 68. *See Yu v. Hasaki Rest., Inc.*, 944 F.3d 395, 402 (2d Cir. 2019)

In light of the foregoing, the parties respectfully request to, through and including, October 13, 2023 to file the necessary paperwork to effectuate the disposition of the instant matter.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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